

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

**HALLIBURTON ENERGY
SERVICES, INC.,** Plaintiff,
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v.
**M-I LLC, d/b/a M-I Drillings Fluids,
L.L.C.,** Defendant.
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C.A. NO.: 6:05-CV-155 (LED)
JURY TRIAL DEMANDED

DECLARATION OF JEFF KIRSNER

1. I am over twenty-one (21) years of age, have never been convicted of a crime involving moral turpitude and am competent to give this Declaration.
2. I reviewed the formulations of the thinners identified generally as "formula I" and "formula II" as referenced in columns 9 and 10 of United States Patent No. 6,887,832 ('832 Patent).
3. I also reviewed the formulations of the preferred thinners identified in the specification by the tradenames "COLDTROL," "ATC," "OMC2," and "DEEP-TREAT" as referenced in columns 10, 11 and 13 of the '832 Patent.
4. I am familiar with the thinners disclosed in International Patent Application Nos. PCT/US00135609 and PCT/US00/135610, which are incorporated by reference into the '832 Patent and in which I am designated as a co-inventor. In column 9 of the '832 Patent, these thinners are described useful for the invention disclosed in the '832 Patent.

5. Based upon my knowledge, both of the products COLDTROL and ATC, the chemical formulas of which are described in formulas I and II, respectively, and International Patent Application Nos. PCT/US00/135609 and PCT/US00/135610, are ethoxylated thinners.

6. Also based upon my knowledge, OMC2 and DEEP-TREAT, the chemical formulas of which are not described in formulas I or II or International Patent Application Nos. PCT/US00/135609 and PCT/US00/135610, are not ethoxylated thinners.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that the statements made upon information and belief are believed by me to be true.

Executed this 16 day of March, 2006 in Houston, Texas.



JEFF KIRSNER